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Counsel for Defendants

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

JONATHAN DUNN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:22-cv-288-JAM-KJN
)	
LLOYD AUSTIN, in his official capacity as)	STIPULATED EXTENSION OF TIME
Secretary of Defense, et al.)	FOR DEFENDANTS TO RESPOND TO
)	PLAINTIFF'S COMPLAINT FROM
Defendants.)	APRIL 18, 2021 UNTIL MAY 2, 2022
)	
)	

Defendants and Plaintiff, through counsel, hereby stipulate and agree to extend the deadline for Defendants to respond to Plaintiff's Complaint from April 18, 2022 until May 2, 2022. This is the parties' first extension request related to the Complaint.

Good cause exists to extend Defendants' deadline to respond to the Complaint. Prior to Plaintiff's filing regarding service, ECF No. 27, the office of undersigned counsel was not aware

1 of service of the Complaint on the U.S. Attorney's Office. Further, undersigned counsel was out
2 of the office on leave last week. Defendants anticipate filing a dispositive motion in response to
3 the Complaint, and respectfully submit that a two-week extension is necessary to adequately
4 prepare the filing.

5 Based on the foregoing, the parties hereby stipulate, and request the Court approve,
6 Defendants filing their response to Plaintiff's Complaint on May 2, 2022.

7 IT IS SO STIPULATED.

8 Dated: April 13, 2022

Respectfully submitted,

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10 BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

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12 PHILLIP A. TALBERT
United States Attorney

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14 ALEXANDER K. HAAS
Director, Federal Programs Branch

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17 /s/ Stuart J. Robinson
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Counsel for Defendants

/s/ Thomas Molloy
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Counsel for Plaintiff

ORDER

The stipulation is approved. The deadline for Defendants to respond to Plaintiff's Complaint is extended until and including May 2, 2022.

DATED: April 13, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE